

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SARAH EDMONDSON, et al.,

Plaintiffs,

v.

KEITH RANIERE, et al.,

Defendants.

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CIVIL ACTION
NO. 20-CV-485

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MOTION REQUESTING LEAVE TO FILE A MOTION IN EXCESS OF 15 PAGES

On behalf of myself, Defendant Nicki Clyne, I hereby respectfully move the Court for leave to file an over-length Response to Plaintiffs' "Memorandum in Support Of Plaintiffs' Motion For Leave To File An Amended Complaint" for the reasons set forth herein. The length of the proposed filing will not exceed thirty-five (35) pages. The Court previously stated:

"As discussed, Plaintiffs shall file a motion to amend their complaint, in a brief not to exceed fifteen pages, by April 3, 2023. Each defendant shall submit a response, also in a brief not to exceed fifteen pages, by May 3, 2023. Plaintiffs shall submit a reply, if they choose, by May 15, 2023, in a brief not to exceed twenty pages."

My response to the Plaintiffs' 150-page submission presently has exceeded the amount of pages allowed by the Local Rules of this Court. I make this Motion for additional pages in order to fully present all of the relevant facts and legal arguments relating to the necessity for the Court to consider my argument to disallow the Third Amended Complaint. It will benefit this Court in its decision-making authority to be fully apprised of complete and thorough arguments in this matter so that justice may be served.

I attempted diligently to stay within the page limit but the complexity of the issue, and the importance of the facts and arguments with relevant legal citations, necessitates an explanation in excess of the allotted 15 pages.

WHEREFORE, for all of the reasons set forth above, Defendant respectfully requests that this Court grant its motion for leave to file an over-length response to Plaintiffs' "Memorandum in Support Of Plaintiffs' Motion For Leave To File An Amended Complaint."

Dated: May 1, 2023

/s/ NICKI CLYNE
Defendant, *Pro Se*